

Case 09-22432 Doc 45-4 Filed 11/19/09 Entered 11/19/09 15:18:49 Desc
Statement Accompanying Relief From Stay Page 1 of 1
REQUIRED STATEMENT
TO ACCOMPANY ALL MOTIONS FOR RELIEF FROM STAY

All Cases: Debtor(s) Jewell L. Haynes Case No. 09 B 22432 Chapter 13

All Cases: Moving Creditor CHASE HOME FINANCE LLC AS SERVICER Date Case Filed 6/19/09
FOR DEUTSCHE BANK NATIONAL TRUST

Nature of Relief Sought: ☒ Lift Stay ☐ Annul Stay ☒ Other (describe) Dismissal, in the alternative

Chapter 13: Date of Confirmation Hearing 12/07/09 or Date Plan Confirmed _____

Chapter 7: _____ No-Asset Report Filed on: _____
_____ No-Asset Report not Filed, Date of Creditor's Meeting _____

1. Collateral
 - a. ☒ Home
 - b. _____ Car Year, Make and Model _____
 - c. _____ Other (describe) _____
2. Balance Owed as of Petition Date: \$189,255.85
Total of all other Liens against Collateral: _____
3. In chapter 13 cases, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.
4. Estimated Value of Collateral (must be supplied in *all* cases) \$205,000.00, per Debtor's Schedules.
5. Default
 - a. _____ Pre-Petition Default
Number of months _____ Amount \$9,293.48
 - b. _____ Post-Petition Default
 - i. _____ On direct payments to the moving creditor
Number of months 3 Amount \$3,468.20
 - ii. _____ On payments to the Standing Chapter 13 Trustee
Number of months _____ Amount _____
6. Other Allegations
 - a. ☒ Lack of Adequate Protection § 362(d)(1)
 - i. _____ No insurance
 - ii. _____ Taxes unpaid Amount \$ _____
 - iii. _____ Rapidly depreciating asset
 - iv. ☒ Other
 - b. _____ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)
 - c. _____ Other "Cause" § 362(d)(1)
 - i. _____ Bad Faith (describe) _____
 - ii. _____ Multiple Filings
 - iii. _____ Other (describe) _____
 - d. Debtor's Statement of Intention regarding the Collateral
 - i. _____ Reaffirm
 - ii. _____ Redeem
 - iii. _____ Surrender
 - iv. ☒ No Statement of Intention Filed

Date: 11/19/2009

/s/ Joel P. Fonferko
Counsel for Movant